

1 RENE L. VALLADARES
Federal Public Defender
2 State Bar No. 11479
MARGARET W. LAMBROSE
3 Assistant Federal Public Defender
Nevada State Bar No. 11626
4 411 E. Bonneville, Ste. 250
Las Vegas, Nevada 89101
5 (702) 388-6577/Phone
(702) 388-6261/Fax
6 Maggie_Lambrose@fd.org

7 Attorney for James A. Wynhoff

8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,
12
13 Plaintiff,
14 v.
15 JAMES A. WYNHOFF,
16 Defendant.

Case No. 2:22-cr-00068-RFB-NJK

**STIPULATION TO CONTINUE
REVOCATION HEARING**
(Second Request)

17
18 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M.
19 Frierson, United States Attorney, and Supriya Prasad, Assistant United States
20 Attorney, counsel for the United States of America, and Rene L. Valladares,
21 Federal Public Defender, and Margaret W. Lambrose, Assistant Federal Public
22 Defender, counsel for James A. Wynhoff, that the Revocation Hearing currently
23 scheduled on January 9, 2023, be vacated and continued to a date and time
24 convenient to the Court, but no sooner than thirty (30) days.

25 This Stipulation is entered into for the following reasons:
26

1 1. The defense requires additional time to confer with Mr. Wynhoff and
2 discuss certain issues pertaining to the presentence investigation report in *United*
3 *States v. Wynhoff*, 2:22-cr-00083-RFB-NJK.

4 2. The defendant is in custody and agrees with the need for the
5 continuance.

6 3. The parties agree to the continuance.

7 This is the second request for a continuance of the revocation hearing.

8 DATED this 29th day of December, 2022.

9
10 RENE L. VALLADARES
11 Federal Public Defender

 JASON M. FRIERSON
 United States Attorney

12 /s/ *Margaret W. Lambrose*
13 By _____
14 MARGARET W. LAMBROSE
 Assistant Federal Public Defender

 /s/ *Supriya Prasad*
 By _____
 SUPRIYA PRASAD
 Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,
4

5 Plaintiff,

6 v.

7 JAMES A. WYNHOFF,
8

9 Defendant.

Case No. 2:22-cr-00068-RFB-NJK

ORDER

10 IT IS THEREFORE ORDERED that the revocation hearing currently
11 scheduled for Monday, January 9, 2023 at 9:00 a.m., be vacated and continued to
12 February 9, 2023 at the hour of 9:00 a.m.

13 DATED this 3rd day of January, 2023.

14 

15
16 RICHARD F. BOULWARE, II
17 UNITED STATES DISTRICT JUDGE
18
19
20
21
22
23
24
25
26